



**Oral Statement**

**Aaron Thompson, Area Manager  
Nebraska-Kansas Area Office**

**Regarding Proposed Integrated Management Plan for the  
Upper Republican Natural Resources District**

**June 10, 2010**

My name is Aaron Thompson. I am the Area Manager of the Bureau of Reclamation's Nebraska-Kansas Area Office located in Grand Island, Nebraska.

Good evening and thank you for the opportunity to present a statement before you this evening. For the record, I am presenting written and oral statements here tonight. I have given a copy of the written statement to the hearing recorder.

The Bureau of Reclamation recognizes the appropriate role of the State of Nebraska to establish and enforce water policy. While the current State water policy of developing and implementing Integrated Management Plans (IMP) is a step in the right direction, Reclamation is concerned the IMP proposed by the State and the Upper Republican NRD is inadequate in that it fails to protect Reclamation's senior water rights from significant ground

water development of the hydrologically connected waters of the Republican River Basin that occurred following approval of the Compact and significant investment in the existing infrastructure. As a result, the investment of the citizens of the United States in the development of infrastructure is in jeopardy.

Federal projects were constructed based on the concept that project surface water rights would be protected. The trend of declining ground water levels in the Upper Republican NRD ensures continuing stream flow depletions. According to NE Stat. 46-715, the IMP should include clear goals and objectives with the purpose of sustaining the balance between water uses and water supplies for both the near term and the long term. Reclamation is very concerned with this balance in the Basin as it relates to surface water supplies.

Reclamation testified at the Republican River Compact Arbitration hearings in April 2009 outlining our concerns that without additional limits and controls on ground water use, the surface water supplies in the Basin will continue to decline making it more difficult for Nebraska to meet Compact compliance in the long term. Reclamation concurs with Arbitrator Dreher's decision that "...Nebraska's current IMPs are inadequate to ensure

compliance with the Compact during prolonged dry years” and “Nebraska and the NRDs should make further reductions in consumptive ground water withdrawals beyond what’s required in the current IMPs.” It is our position that ground water consumptive use must be reduced to a level that will allow base flows to recover to an extent that will allow Nebraska to consistently comply with the Compact in both the near term and long term. This is the only way Nebraska can meet the IMP goal of “sustaining a balance between water uses and water supplies . . .” Likewise, Arbitrator Dreher concluded in his Final Decision that “Nebraska’s problem in complying with the Compact is... groundwater consumptive use, not surface water consumptive use.”

This proposed IMP continues to allow for the unfair use of surface water supplies to make up for deficits caused by years of ground water overuse and fails to address past ground water use and future ground water declines that will continue to deplete the streamflows. In water-short years, surface water users experience significant water shortages due to the reduced surface water supplies while ground water users have the capability to pump sufficient ground water to meet most of their irrigation demands. As a result, ground water depletions to surface flows have continued to gradually increase while surface water diversions and depletions continue to decline.